

This democratic and transparent process allows stakeholders in the organic community to be empowered to thoughtfully and thoroughly discuss issues in a transparent manner. Open discussion may not be the most efficient way to run the organic program, but transparency and the allowance for public discussion is the only way to maintain the trust and the obtain acceptance of the organic community.

### **Sanitizers and the 100% claim**

In answer to the committee's questions:

Yes, the 100% organic claim does hold value for me, because I understand the product has been grown and processed without synthetics and consists of 100% certified organic ingredients. I do believe that the contact with a non-organic processing aid should effect whether or not there can be an organic claim. For example, in meat processing, an operation can choose to use steam or very hot water as mitigation against pathogens on the carcass or use lactic acid. The operation that has the infrastructure and management skills to avoid the use of the synthetic (even if it is an approved synthetic) should have the opportunity to differentiate themselves in the marketplace. An apple juice maker who uses organic rice hulls as a clarification processing aid, should also be able to differentiate themselves in the marketplace from someone who runs their organic apple juice through nonorganic rice hulls for clarification.

Yes, I do believe that food that has been in contact with a synthetic sanitizer loses its 100% organic status. Many operations rinse off sanitizers with potable water, or run a flush of organic product through a recently sanitized line, before allowing contact with an organic product. In the poultry industry, it is common practice to soak chicken in a high concentration chlorine solution to kill pathogens. This chlorinated water is soaked up into the chicken, and the amount of added "moisture" must be listed on the label. In organic production, only pure water or ice may be used to chill the chicken before packaging. I am concerned that allowance of contact with sanitizers in a 100% organically labeled product, could eventually lead to a similar scenario with chlorinated water in poultry, or salad greens.

A food contact sanitizer is meant to specifically kill pathogens or bacteria present on tables or equipment that directly touch food. Processing aids are a variety of substances that may or may not have some residual amounts in the finished product, that perform a specific function, such as clarifying apple juice. As an organic inspector, I don't think it has been that difficult to determine the difference between a processing aid and a food contact substance. However, all products, including packaging are reviewed to determine compliance with the organic regulations before certification is granted. I do have a small organic dehydration facility for herbs on my farm, which is state licensed as well. We use organic vinegar for washing down the food contact surfaces. We do not use any processing aids.

The vast majority of products in the marketplace are labeled as organic, not 100% organic. This organic label is widely accepted by the organic consumer. I do not see any reason to weaken the 100% organic label with the allowance of contact with synthetic sanitizers. Those producers who have gone the extra mile to avoid the use of synthetic sanitizers, should be rewarded for their effort with the elite label of 100% organic.

### **GMO letter to the Secretary**

I strongly support the direction of the GMO letter to the Secretary Vilsack. As spokespersons for the organic industry within the USDA, the NOSB should use its regulatory function to keep the Secretary informed of issues of concern to the organic community. I am aware that our Secretary and Deputy Secretary are sympathetic to organics and want to see us thrive, however, GMOs are a great threat both to

farmers whose crops are rejected due to drift caused from no fault of their own, and to consumers who specifically chose organic to avoid consuming GMOs. I hope this letter is the beginning of more in-depth discussion towards solving this serious issue.

### **Materials Committee- Extractant and Solvents, Significant Residues**

I support the comments of the National Organic Coalition on this issue. We need to be continually experimenting not only on farms, but also within food processing. By having a strict interpretation on residues and definitions that affect the classification of ingredients used in organic foods, we encourage research into formulations and processing strategies that avoid synthetics. Food processors who wish to achieve more than the “made with organic” label, are rewarded for their innovation in the marketplace, by the use of the “organic” label. The organic consumer wants less synthetics, not more, in their foods. While having diversity of choice in the organic category can provide organic farmers more markets for their products, we do not truly advance the growth of organics by allowing synthetics that would be viewed negatively by the organic consumer. I thank the committee for their tenaciousness in continually tackling these difficult scenarios, and believe that when we have clarity and solutions to these issues, they will be comprehensive and defensible to the greater community.

MOSES is a nonprofit education organization that promotes organic and sustainable agriculture. We interact with 1000s of organic farmers and agricultural professionals every year, through our popular website and monthly e-news, more than 20 field days and trainings, and the Organic Farming Conference, held annually which had over 3300 attendees in 2012. MOSES has a toll free information line and provides numerous other resources, from soil building to marketing and everything in between. Our database contains over 35,000 contacts.

Sincerely,



Harriet Behar  
MOSES Organic Specialist